Dear Sir/Madam,

I am writing on behalf of BMA Cymru Wales in response to the above consultation which is being conducted by the Welsh Government.

Whilst we do not seek to provide a comprehensive response to this consultation, some of our GP members have nonetheless raised some issues which they would like to be taken into consideration. These are outlined below. We also attach for reference a copy of our previously-submitted evidence to the independent review of HIW that was carried out by Ruth Marks on behalf of the Welsh Government.

We note that there is an intention within the draft strategic plan to conduct a thematic review of discharge arrangements in 2016-17 (which will include looking at the interface between secondary and primary care) and a further thematic review of diagnostic services in 2017-18. We would however suggest that thought should be given to changing the order in which these reviews are conducted since insufficient access to diagnostics can be a key contributory factor in unnecessary admissions to secondary care.

It may therefore be better for HIW to have a greater understanding of the issues impacting on the availability of diagnostics before going on to look at how this impacts on the primary-secondary care interface. HIW might wish to consider, for example, whether there is a role for greater access by GPs to services such as MRI and ultrasound through a suitable controlled protocol.

We would further suggest that, as part of this work, HIW needs to consider the impact on these issues of the resourcing of primary care. Unless that is effectively addressed, in our view, it is unlikely that it will be possible to develop a suitably efficient interface between primary and secondary care as might be intended.

Ysgrifennydd Cymreig/Welsh secretary:
Dr Richard JP Lewis, CSU DL MB ChB MRCPG MFFLM Dip IMC RCS(Ed) PGDip FLM

Prif weithredwr/Chief executive:
Keith Ward

Cofrestryd yn Gwmi Cyfyngedig trwy Warrant. Rhif Cofrestredig: 8848 Lloegr
Sweyddfa gofrestredig: BMA House, Tavistock Square, Llundain, WC1H 9JP.
Rhestrwyd yn Undeb Llafur o dan Ddeddf Undebau Llafur a Chysylltiadau Llafur 1974.
Registered as a Company limited by Guarantee. Registered No. 8848 England.
Registered office: BMA House, Tavistock Square, London, WC1H 9JP.
Listed as a Trade Union under the Trade Union and Labour Relations Act 1974.
HIW might therefore wish to look at how primary and community care could be better resourced in order to reduce admissions to secondary care. This could include looking at how this impacts on urgent admissions.

They might further wish to consider how current NHS systems in Wales may be stopping unnecessary admissions from being prevented, and whether there is a need for a shift in some resource from secondary to primary care to enable more patients to be effectively managed within primary care settings.

On a separate issue, a further point we wish to raise is the suggestion that HIW might wish to give consideration to expanding their remit to cover community pharmacies given that they are now providers of flu vaccine on behalf of NHS Wales.

Yours sincerely,

Rodney Berman
Senior Policy Executive